



FREDERICKSBURG AREA ASSOCIATION OF REALTORS®

November 5, 2010

The Honorable Lisa Jackson
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Administrator Jackson:

On behalf of the more than 1,400 members and affiliate members of the Fredericksburg Area Association of REALTORS® (FAAR), I am submitting comments regarding the proposed rule issued by the Environmental Protection Agency (EPA) on establishing a Total Maximum Daily Load (TMDL) for states in the Chesapeake Bay Watershed.

FAAR is strongly supportive of efforts to restore and protect the Chesapeake Bay and its tributaries. We are blessed in the Fredericksburg area to have easy access to the Rappahannock and Potomac rivers and the health of these resources is vital to the local economy. However, FAAR has serious reservations about some proposals and their benefits as opposed to the costs they will impose on homeowners as well as state and local governments. FAAR urges the EPA to delay implementation of the TMDL and backstops for at least one year.

Of particular concern to our industry are the urban and suburban stormwater retrofits that would be required of existing properties, including state and local highways. It will be extremely costly for existing developments to install the required stormwater controls and the benefits to be gained by these expensive retrofits do not justify the costs. In addition, requiring retrofits on existing infrastructure such as roads and parking lots will be extremely costly for the government and businesses and very disruptive to the community.

FAAR appreciates EPA's efforts to improve the health of the Bay, but we urge you to slow down and truly calculate the costs of TMDL compliance on local governments, businesses, and citizens in areas that are already struggling with unemployment, foreclosures, and shrinking budgets. Thank you for your consideration of these important issues.

Sincerely,

Latana Locke
President

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